

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

XU LUN, a pseudonym,

Plaintiff,

v.

MILWAUKEE ELECTRIC TOOL
CORPORATION, and
TECHTRONIC INDUSTRIES
COMPANY LIMITED,

Defendants.

Case No. 2:24-cv-00803-BHL

**JOINT STIPULATION REGARDING AMENDMENT OF COMPLAINT AND
BRIEFING SCHEDULE**

Considering that Plaintiff Xu Lun has the right to amend the complaint under Rule 15(a)(1)(B) of the Federal Rules of Civil Procedure in response to the September 13, 2024 motions to dismiss filed by Defendants Milwaukee Electric Tool Corporation and Techtronic Industries Company Limited, the parties, by and through their respective attorneys of record, stipulate and agree as follows:

1. Plaintiff will file the amended complaint on or before October 14, 2024.
2. Defendants will answer, move, or otherwise respond to the amended complaint on or before November 13, 2024.
3. Plaintiff will file oppositions to any motions to dismiss on or before December 13, 2024.
4. Defendants will file replies in support of any motions to dismiss on or before January 10, 2025.

5. This schedule is sought for good cause, including to set an orderly and agreed upon briefing schedule given Plaintiff's intent to amend the complaint as of right under Rule 15(a)(1)(B).

6. The Parties respectfully request that the Court enter the attached proposed order setting the requested deadlines.

Dated: September 30, 2024

/s/ Times Wang

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